



INDEPENDENT PUBLIC INQUIRY:

“THE PUBLIC & THE BBC; WHAT ROLE IN OVERSIGHT & GOVERNANCE?”

STAKEHOLDER* ENGAGEMENT WITH, & ACCOUNTABILITY FROM, THE BBC

REPORT PUBLISHED 1 SEPTEMBER 2016

www.saveourbbc.net

CONTENTS	Page
1. Introduction	3
2. Executive Summary	5
3. Background	9
4. Project Specification & Methodology	11
5. Submissions	15
6. Outcome from Workshop	48
7. Conclusions & Recommendations	53
Appendices	
A. News Release announcing launch of Inquiry	a
B. Letter Published in Radio Times	b
C. List of Contributors	c
D. Workshop Agenda	e
E. Extracts from 'Future of TV' Report	g
F. Acknowledgements	m

1. INTRODUCTION

Scope of “The Public & The BBC; What Role in Oversight & Governance” Inquiry

We recognised that the governance arrangements for the BBC will be revised significantly in the next Royal Charter, which is due to come into effect on 1 January 2017. Until now, whilst the BBC in its various forms has been responsible for the interests of the licence fee payers, this has been left with Executives and Non-Executives appointed by others and without any direct mechanisms for accountability.

This Inquiry was set up to consider:

1. The need and justification for the BBC’s licence fee payers and users to be able to engage with, and hold to account, the BBC.
2. Ways in which those who fund the BBC through whatever evolution of the licence fee may emerge in the future have a direct involvement and engagement with the BBC.

The purpose of the Inquiry

To determine if there is a need to promote accountability to licence fee payers and if so to identify possible structures which would meet any need identified. Also to evaluate the impact of Sir David Clementi’s report on governance if implemented.

The gathering of material

Contributions were invited as widely as possible and submissions were sought from individual licence fee payers, members of the BBC’s audiences and users of its services and from media, academic and civil organisations. In addition, we called for oral evidence from key individuals and organisations with specific expertise or experience.

The contact for this Inquiry

The Project Manager is Peter Blackman, Strategic Director, Save Our BBC. Academic support was offered by Cardiff University and Professor Richard Sambrook.

The Aims of this Inquiry are:

An independent Inquiry to:

- Examine ways in which Television Licence Fee Payers and the BBC's audiences and service users could and/or should engage directly with the BBC to provide clear two-way accountability and responsibility.
- Inform the Government's forthcoming Royal Charter and the BBC's future governance.

Context:

- At present all 'representatives' of the Licence Fee payers are appointed in their personal capacities; there is no direct accountable democratic link or responsibility.
- Proposed revised governance arrangements do not address this gap.
- In a corporation or membership organisation, the paying stakeholders elect their representatives and hold them to account.
- Parliamentary reporting and regulatory oversight are not the answers to direct stakeholder accountability.
- Views and evidence are invited about how licence fee payers, audiences and service users of the BBC can be properly engaged in this day and age?

This inquiry is promoted and produced by Save Our BBC, with expert support and advice from Cardiff University's School of Journalism, Media and Cultural Studies.

*Stakeholder in the BBC: The definition of a "licence fee payer" in the BBC's Charter includes all the members of its present and future audiences and service users.

Extract from: The Royal Charter for the continuance of the British Broadcasting Corporation; October 2006

"S57.

The meaning of "licence fee payer"

In this Charter, a reference to a "licence fee payer" is not to be taken literally but **includes, not only a person to whom a TV licence is issued** under section 364 of the Communications Act 2003, **but also** (so far as is sensible in the context) **any other person in the UK who watches, listens to or uses any BBC service, or may do so or wish to do so in the future [our emphasis]."**

2. EXECUTIVE SUMMARY

There can be little doubt that high quality, trustworthy content and information is at a premium at the moment – particularly in news and current affairs, but also in other kinds of programming. At the heart of trust, lies clear, transparent accountability – lacking in many media organisations.

The discussions about the BBC's next charter have had a heavy focus on regulation and governance – but little on direct accountability to the public, who are the ultimate owners and stakeholders of the organisation. We believe if the BBC is to continue to fulfil its role as a trusted, open and accountable institution at the heart of British life more must be done to deliver genuine accountability to its viewers and listeners and readers – the licence fee payers. We also believe that strengthened accountability to the public will help protect the BBC against undue political or commercial pressures.

That's why at the heart of this inquiry and its recommendations lies a new idea to deliver such public accountability through an online, licence fee payers forum which the BBC board and Ofcom, as regulator, would be required to consult over major issues.

It is only one recommendation amongst a number all focused on more open, transparent, engagement with the public.

Sir David Clementi published "A Review of the Governance & Regulation of the BBC" in March 2016. This left concern about the future independence of the BBC if appointments of non-executive directors to an unitary board are made by the Government. At present, the interests of the Licence Fee (LF) Payers have been the responsibility of the BBC Trust; this left the Trust with a conflict of interest between that duty of accountability and its governance role.

We broadly accept Sir David's recommendations that the BBC in future be governed by an unitary board and be regulated by Ofcom. However, in the Government's Charter renewal work to date, there has been no mention of the audiences, service

users, the LF Payers, the stakeholders, of the BBC having any role in its future governance, nor of how the BBC would be accountable to them.

Hence we established our Inquiry in April 2016 to consider:

- The need and justification for the BBC's LF Payers and users to be able to engage with the BBC, and hold it to account; and,
- If that need were established, to identify possible structures to deliver engagement, accountability, transparency and independence.

The main points made in the submissions to the Inquiry were:

- Conflating governance, accountability and regulation is unhelpful
- No present link from board to public & no real engagement with public
- Non executives to be appointed on merit, not political affiliation
- Opposed to direct government appointments
- Ofcom too rooted in economic regulation; needs broader approach
- Need transparency of appointments process and LF deals
- Executives need to be more accountable
- Reformed Audience Councils to be vehicles for genuine consultation
- Reflect greater diversity required (gender/ethnic/LGBT)
- Scrutiny beyond Parliament required

Our Conclusions:

There is demand from and need for real accountability, engagement, involvement, partnership, representation, dialogue, and transparency to consolidate public trust.

Transparency

- The BBC, led by its executives, must be accessible and open
- Lack of information, data, feedback and media literacy must be addressed

Accountability

- Accountability is beyond that to Parliaments; Accountability must be to the UK as a whole, to its nations and regions
- Consultation is not enough; engagement and accountability are much more

Engagement

- Licence Fee payers are stakeholders and must experience a sense of ownership; engagement and accountability can be delivered using ICT;
- Diversity & devolution must improve

Independence

- Independence of BBC is sacrosanct
- Clementi's recommendations for a unitary board and regulation by Ofcom generally accepted
- But most serious concerns about appointments process for non-executives to unitary board and fear of Government/political interference; however, the unitary board must be effective and efficient

Audience Councils

- Audience Council weaknesses:
 - Only 4 and nationally based; lacking diversity and not representative; no authority; BBC is not accountable to them; advisory only
 - Divorced from LF payers; not using modern means of engagement and not accessible

Our Recommendations:

- **Proper engagement between the BBC and its LF payers is needed now and the BBC must be clearly accountable to the LF payers.**
- **No accommodation has been made for accountability to the LF payers in governance proposals to date.**

Public accountability and engagement:

- **Our recommendation for this is:**
 - **That all LF payers are automatic members of a LF Payers Forum; engagement is by digital and virtual means & consideration has to be given to engaging with LF payers without ICT**
 - **Virtual Audience Councils should be established and facilitated by the BBC for: all channels and services; nations; regions; and, local radio stations**

- **LF payers should be able to establish other Audience Forums**
- **All Audience Councils and Forums feed views to the LF Payers Forum which will act as the two-way communication conduit between the LF Payers and the BBC at board level**
- **The funding and resourcing for this should come from the LF income which has always paid for 'accountability'.**
- **This needs more detailed work and we call upon the BBC, the BBC Trust, Ofcom, the DCMS and Government and others to work with us to devise the necessary mechanisms.**

Regulation and Independence:

- **The regulator, Ofcom, should not be accountable to the LF payers but must be required to take their interests and views into account.**
- **The unitary board must be effective as the vehicle for the management and strategy of the BBC; it must not be unwieldy and we agree with most of the recommendations made by Sir David Normington in his paper "Appointing the BBC board".**
- **However, we believe only the Chair and Deputy Chair should be subject to his point that the secretary of state should be presented with the two best candidates for those positions and must appoint one of them or ask for a rerun. An independent panel should appoint the other non-executives without any political involvement.**
- **The unitary board must have the right mix of people, backgrounds and skills to deliver a BBC which continues to be the best public service broadcaster in the world, whilst delivering value for money.**
- **The job specification for all executive & non-executive unitary board directors must include being accountable to the LF payers.**
- **Four non-executive directors must also have the responsibility to be accountable to the Parliaments and LF payers of the four nations.**
- **The BBC should hold an AGM, accessible by virtual means to everyone and AGMs for the four nations.**
- **All Audience Councils should hold an AGM.**

3. BACKGROUND

The situation in the UK has changed dramatically in recent months, mainly as a result of the outcome of the Referendum and decision that the UK should leave the EU. Subsequently, there was an unexpectedly quick change of Government. When reading this report, please note that this Inquiry started in April 2016. At that stage, the expected timetable was that a White Paper about the future of the BBC was expected by the summer. That White Paper was indeed published on 12 May 2016.

This Inquiry was formed in the context of the report by Sir David Clementi about the potential future governance of the BBC and submissions were influenced by that Report, and by rumours about the content of the White Paper and then the White Paper itself.

The initial hope that this Inquiry would report in time to influence the White Paper was impossible to achieve.

It was then expected that the draft new Charter would be published between the Referendum and the Parliamentary summer recess. We hoped to publish the report of our Inquiry in time to influence debate about the draft new Charter, that is by early July.

After the Referendum, it was initially expected that the Government of Mr Cameron would continue until early September 2016 and key policy matters would be held for review after that by a new Government. With the change of government leadership on 13 July a new Secretary of State for Culture, Media & Sport was appointed. So there is now an expectation that a draft new Charter for the BBC will be published in the first half of September 2016, be debated in both Houses of Parliament and come into effect on 1 January 2017.

Our intention now (late August 2016) is to publish our report at the start of September 2016 and use it to inform the subsequent debates about the arrangements for the governance of the BBC with effect from 1 January 2017.

These many changes during the lifetime of our Inquiry need to be borne in mind when reading this report. In particular the background and terms of reference were drafted in March/April 2016 and have been overtaken by events. This report reflects the journey this Inquiry has taken.

Why this Inquiry is needed now (April 2016)

The publication of the Sir David Clementi report into the future governance of the BBC has led to much concern about the appointments of proposed Non-Executive Directors of a unitary board for the BBC and of key regulators for the BBC at Ofcom. Should such appointments be made by the Government of the day? Should they be made by the Public Appointments process? In this day and age of transparency and accountability the existing and proposed systems seem to be anachronistic.

There is a very real risk, perceived by some as ministerial intent, that the BBC may become more of a 'state broadcaster', further interfered with by Government, rather than being the great independent national broadcaster we have had.

In all the Department of Culture, Media & Sport work to date about the BBC's Charter renewal, there has been no mention of the audiences and service users of the BBC having any role in its governance.

We believe these issues need to be heard and addressed by Government in advance of new arrangements being finalised and introduced. Where is the direct involvement and influence of the licence fee payers, audiences and service users? Who can they hold to account? How can they hold appointees and the BBC to account? How far should they have some influence on BBC strategy and performance and how can that be achieved?

The timescale

This Inquiry started in April 2016. At that time, the White Paper on the BBC's future was due to be published "by the summer". We wanted to inform the Government about ways in which true stakeholder (licence fee payer) engagement and accountability can and should be achieved. The aim then was to report by early July 2016.

4. PROJECT SPECIFICATION & METHODOLOGY

This section reports the original specification and subsequent amendments in light of changing events.

The original Terms of Reference for this Inquiry were:

“An independent Inquiry to examine ways in which Television Licence Fee Payers and the BBC’s audiences and service users could and/or should engage directly with the BBC to provide clear two-way accountability and responsibility.

To report by end May 2016 to inform the Government’s forthcoming White Paper.

Written and oral evidence to be received by Thursday 5 May 2016.

Context:

- At present all ‘representatives’ of the Licence Fee payers are appointed in their personal capacities; there is no direct accountable democratic link or responsibility
- Proposed revised governance arrangements do not address this
- In a corporation or membership organisation, the paying stakeholders elect their representatives and hold them to account
- Parliamentary reporting and regulatory oversight are not the answers to direct stakeholder accountability
- Views and evidence are invited as to: How can the licence fee payers, audiences and service users of the BBC be properly engaged in this day and age?

This inquiry is promoted and produced by Save Our BBC with support from Cardiff University.”

Stakeholder in the BBC: The definition of a “licence fee payer” in the BBC’s Charter includes all the members of its present and future audiences and service users.

Extract from: The Royal Charter for the continuance of the British Broadcasting Corporation; October 2006

“S57.

The meaning of “licence fee payer”

In this Charter, a reference to a “licence fee payer” is not to be taken literally but includes, not only a person to whom a TV licence is issued under section 364 of the Communications Act 2003, but also (so far as is sensible in the context) any other person in the UK who watches, listens to or uses any BBC service, or may do so or wish to do so in the future.”

The original timescale

“The White Paper on the BBC’s future is due to be published “by the summer”. We want to inform the Government about ways in which true stakeholder (licence fee payer) engagement and accountability can and should be achieved. Therefore we must report by the beginning of June 2016 when we will publish our findings.” [After a number of changes, described in Section 4, we are now reporting by the end of August 2016.](#)

How the Inquiry gathered evidence

“We will invite contributions as widely as possible and accept submissions from individual licence fee payers, members of the BBC’s audiences and users of its services and from media, academic and civil organisations. In addition we will call for oral evidence from key individuals and organisations with specific expertise or experience.”

The news release, Appendix A, was reported by some media. Our letter was published by The Radio Times, Appendix B. We announced the Inquiry widely and repeatedly on social media. Throughout the existence of our campaign it has been our mission to reach the wide populist audiences of BBC radio and television and of its digital services. To do so we have used our website, social media and virtual communications. As a result our reach is larger than the adult population of the UK.

We also sent individual invitations to all those listed as having contributed to Sir David Clementi’s Report, to other leading decision makers and opinion formers and to those recommended to us by our advisors.

How were submissions made to this Inquiry?

“Anyone who wishes to make a submission should send it as either a Word or pdf document to: inquiry@saveourbbc.net by **no later than 23:59 on Thursday 5 May 2016**.

A small number of highly relevant organisations will also be invited to give oral evidence; anyone else who wants to ask about the possibility of giving oral evidence to the Inquiry should contact the Inquiry Secretariat inquiry@saveourbbc.net **no later than 23:59 on Thursday 21 April 2016.**”

Written hard copy submissions were received from a lot of Radio Times readers who do not have computers. Others submitted responses by email. Eight comprehensive oral sessions of evidence were also taken either face to face or using the Cisco WebEx system.

The contact for this Inquiry

“The Project Manager is Peter Blackman, Strategic Director, Save Our BBC. Professor Richard Sambrook of Cardiff University offered academic and expert support.

The Questions

“Respondents are asked to address the following questions:

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

Any other relevant comments respondents care to make will be appreciated.”

The results

Full reports of the submissions follow in section 5. These have been collated respecting Chatham House Rules. However, the reports and submissions have been audited for accuracy by our academic support. Some contributors submitted 'on the record' material and where that is the case attributions are made clear. A full list of contributors is in Appendix C.

All the material gathered was then moderated at a workshop held at Cardiff University on 26 May 2016. The Workshop Agenda is at Appendix D.

This report has also been compiled in conjunction with the support, advice and guidance of our academic partner Professor Richard Sambrook, Cardiff University, but the contents are the sole responsibility of Save Our BBC CIC.

5. SUBMISSIONS

Collation of key comments from: Letters received from Radio Times readers:

- Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.
 - Fairly satisfied
 - Concern about submissions to Green Papers not all read
 - No; because licence fee payers have no say in decision-making
 - Yes because it has delivered the programmes I want
 - Generally yes but confused/conflicting responsibilities and accountabilities have been apparent when serious issues have arisen
 - Damaging behaviour by some broadcasters has damaged the BBC's image without being addressed
 - Perceptions of political bias should be addressed and Lord Reith's original precepts restored

- Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.
 - Yes
 - No; threatens BBC's independence & threatens us with a Government State Broadcaster, political bias and indoctrination
 - No; chances of Government appointments & 'interference' too strong
 - Wrong for LF payers to take on responsibility for free licences for over 75s

- Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- No Government should interfere with or influence BBC and dilute its independence; BBC's independence must be maintained at all costs
- Licence Fee payers must have separate forum or agency to contact and act as liaison for all BBC related matters
- Public pathway for LF payers required; eg a membership organisation; fee paying £1 –not to BBC- for operation; perhaps a 'Friends of the BBC'?
- Nominated LF payers to attend BBC's AGM/EGMs & other relevant meetings for impact & transparency
- Representatives nominated for election akin to that of a mutual society
- A body to represent LF payers' views with vetting & amending role akin to a 'Second Chamber'
- Board should include distinguished people from theatre, journalism, finance, sport etc, perhaps chaired by leading figure from VLV
- Accountability should be via independent governing board in which Licence Fee payers have a say via elections for 'local' representatives with suitable broadcasting experience for the regions and nations eg South Today or Radio Solent
- LF payers should have a vote on the level of and use of the Licence Fee
- LF payers should ratify those aspiring to executive and non-executive board roles with BBC and Ofcom
- LF payers should be treated as shareholders, be able to hold BBC accountable for standards; technology should be used to include public comment and show views about standards
- Any other relevant comments respondents care to make will be appreciated
- Don't want BBC programmes interrupted by adverts
- Don't want regular programmes ditched for sports events eg snooker & golf which should go on red button
- Concern about rumours BBC Four may suffer cuts to special interest documentaries inc archaeology, astronomy, travel, history
- Red Button side panel must survive/ very valuable

- Too many [similar] mediocre radio stations sapping finance; want quality of Home Service, Third Programme & Light Programme
- Blind & sight impaired people [estimated 2m people in UK; Guide Dogs] reliant on BBC radio
- People who 'just' listen to BBC Radio often say they are prepared to pay
- Entirely rely on Radio Times for programme information (not a user of technology)
- Over 75 happy to pay for licence fee
- Over 75s unable to pay full licence fee would be willing to pay what they can afford
- Serious concern about damage to global reputation if BBC tampered with & become state-controlled in any way
- Government must not interfere in scheduling
- Can't afford to pay for subscription services but willing to pay more for BBC
- Wants iPlayer loophole shut

Collation of key comments from: Emails received from general public:

- Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.
- No; because licence fee payers have no true representation decision-making
- No; BBC unable to regulate itself & not accountable
- Had LF payers been present at governance level unlikely £600m would have been taken from BBC by Government
- Yes subject to needing more openness & transparency to be fit for purpose
- Disapprove of top slicing
- Freezing licence fee unacceptable
- No because has been subject to political interference
- Damaging behaviour by some broadcasters has damaged the BBC's image without being addressed

- No; it has allowed a haemorrhage of journalistic talent, reduced programming quality & poor decision making

- Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.
 - No; threatened BBC's (editorial, programming & scheduling) independence & threatens us with a Government State Broadcaster
 - No; BBC Board Directors should never be political appointments
 - No effective governance proposed
 - No; LF payers should have say in Governance of BBC and Ofcom
 - 'Diversity' shouldn't be used to put BBC at mercy of global giant commercial media corporations, foreign or UK owned
 - Secure funding should follow remit
 - Yes in so far as they make the BBC Executive more accountable to licence fee payers

- Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.
 - BBC Trust should be made up of elected representatives of licence fee payers & have power to veto inappropriate politically or commercially motivated decisions about the BBC
 - Replace Governors & Trustees with Licence Fee payers
 - Replace weak Ofcom with strong regulator
 - There should be space between Government of day and all broadcasters. House of Commons Heterocasting* Committee with statutory Opposition majority top of regulatory structure; next level down an Heterocasting Auditor General with staff overseeing BBC and all independent broadcasters.

*Heterocasting = broadcasting, narrowcasting & all modes of electromagnetic communication

- One third of unitary board should be chosen by LF payers; maximum of two Government appointees to avoid being viewed as a 'state broadcaster'
- Half of unitary board being appointed by Government would seriously adversely affect impartiality
- All UK areas (to be decided) to have non-executive directors nominated by, voted online for and as representatives of the LF payers; nominees to make statements of intent and strengths (maximum words)
- Attention is drawn to the concerns expressed by David Normington, outgoing Commissioner for Public Appointments, about 'manipulation' of the public appointments process by the Secretary of State for Culture, Media & Sport, particularly in the appointment to a trustee vacancy at the National Portrait Gallery
- BBC should be answerable to licence fee payers, audiences & service users
- Three members of public with proven genuine interest in BBC to serve on unitary board of BBC for three year terms
- co-opt non-political party LF payers to Board for 2 year terms
- Regulator of BBC must be by people without political, commercial or financial interests & should include members of audiences
- Subscription model for BBC would give payers accountability
- Use IT and social media to deliver accountability to licence fee payers including easy use of login; increased use of all this would encourage more engagement with younger people
- New independent regulator should be responsible to stakeholders & independent of politics
- Board must be more diverse and gender balanced

Collation of key comments from: Emails received from key organisations & people:

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- A consensus has evolved amongst all sides of this debate that the governance structures of the BBC must be reformed. The BBC Trust did improve upon the means by which audiences were engaged and consulted on key decisions. But more can be done give LF payers a more structured role in the decision-making of the organisation.
- We are extremely disappointed and concerned that the current Charter Renewal process was preceded by another hastily agreed licence fee deal which we believe will lead to further cuts to services and job losses at the BBC. The public and those who work for the BBC were denied any say about the previous licence fee settlement in 2010 and it had been hoped that a much more transparent process would have taken place in 2015, particularly given the level of media speculation surrounding the BBC throughout the General Election campaign. The lack of transparency surrounding the last two licence fee settlements are a matter of considerable concern for licence fee payers and the thousands of people who work at or for the BBC, as well as the industry, and the process for such agreements should be made more transparent and accountable as an urgent priority.

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- We:
 - believe that the BBC is a real Public Service, and that licence fee payers should have more than just a consultative role in major issues like the terms of the charter.

- understand that the BBC must be properly regulated and governed, but believe it should not be subject to excessive government interference. The proposals regarding government representation on a new unitary board are excessive, as is any government interference in editorial matters.
- would welcome increased representation of ordinary licence fee payers at board level, but accept that there are practical issues regarding the nature of that representation
- A Unitary Board and regulatory oversight by Ofcom seem to be broadly accepted as a governance structure going forward. Any new Unitary Board must protect and preserve the BBC's independence, impartiality and integrity. All editorial decisions must remain with the BBC. Appointments to the Unitary Board should be made through an independent appointments committee, established by the Commissioner for Public Appointments. Government should not control these appointments. Members appointed to the Unitary Board should represent each of the nations of Great Britain, the BBC staff and, crucially, BBC audiences.
- We welcome much of the Clementi Review including the establishment of a unitary Board which inter alia will have responsibility for the interests of Licence Fee payers. We agree that Ofcom is an established and experienced regulator in the media sector and notes that its new Chief Executive has indicated that Ofcom would be willing to exercise some of the regulatory functions of the BBC going forward – however we do believe there are also a number of potential problems with this approach. Ofcom is currently firmly rooted in the commercial sector and would have to undergo significant reform to undertake responsibility for the BBC. Notwithstanding the operations of the new Board, under the Ofcom model there also may not be representation for important groups whose views must be taken into account – specifically representatives of the workforce and licence fee payers.
- We are also supportive of the recommendation to introduce operating licences for the BBC. These consultations provide a channel for the public to express concerns and give feedback, most recently about the future of

BBC Three and the operation of the BBC's radio stations. Consultation of this nature should continue into the future; however consideration should be given as to how licence fee payers and the general public can more widely contribute their views.

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- The Licence Fee payers should be represented at board level. An independent appointments committee should recommend the appointment of a member with specific responsibility for representing the public's voice in key decisions.

- "Accountability for Delivery

A key part of this decentralised approach is to bring the accountability structures for the BBC similarly into line with the new political position of the UK and closer to audiences in the nations and regions. Consequently through this model we would propose a unitary board structure for Scotland, charged with holding BBC Scotland to account for the delivery of an agreed strategy, governing its output and investment of a budget agreed between the board and senior management of the BBC. This would build upon elements of this structure which already exist, by equipping expanded boards with a wider range of powers and greater degree of budget control in order to create semi-autonomous units within the overall structure of the BBC.

A Scottish board would also send members to a UK board, which would be responsible for the centrally provided services of the BBC, with appropriate skilled representation from all the nations and regions of the UK. The Scottish and UK boards would also be held to account by the Scottish parliament through the role set out in the Memorandum of Understanding and to be established in the Charter.

Each board would be composed of members of staff of the BBC in that region, independent members from the sector and representatives of the audience of the BBC. The board would send members to a UK board, with responsibility

for setting the overall framework for the operation of the BBC corporately, such as on issues like pay and benefits, and UK network issues such as schedules.

In this structure the unitary board could have full responsibility for the running of the BBC within the region it represented, and control over more of the revenue raised by the BBC in that region than is presently the case. A percentage would support the valuable centrally provided services of the BBC, including some network content and the BBC world service etc. making up the balance of funds to that of the licence fee revenue raised. The contribution to the centre would be proportionate to the capacity in the industry and the benefits to that region and could change over time.” [extract Scottish Government Policy Paper on BBC Charter Renewal, February 2016]

- We say that specific decisions about the BBC’s services or content should not be a matter for Government. These decisions should be taken by the BBC, in accordance with the parameters set out by its regulator and in concert with the appropriate consultation mechanisms with licence fee payers. The independence of the BBC and any new regulatory body should also be carefully protected. Audience Councils should be given more prominence by the BBC and/or its regulator. Given the need to address the lower levels of satisfaction of certain BBC audience groups including those living in Scotland and Northern Ireland and certain ethnic groups, the structure of Audience Councils could be given more visibility and could be given a more robust remit or focus, for example in terms of representing underserved audiences and BAME, LGBT, women and disabled audiences.

Any other relevant comments respondents care to make will be appreciated

- BBC Trust refers to their response to the Green Paper (http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/charter_review/dcms_response.pdf) Q17 p57-59; it talks about the importance of engagement with audiences, their voices & views, and that present level of transparency is ‘appropriate’ and is greater than all other organisations in this

field; relies on ICM research August-September 2015 [Ed: overtaken by subsequent events? It hardly mentions the word ‘accountability’; “Because of its importance, it has been suggested that the Charter should include high-level requirements about engagement with audiences, but it should not be too prescriptive about how this is done.”];

- An advocate for religious broadcasting, bemoans the fact that the BBC has not acted upon the views expressed to it by various organisations and individuals about the way it covers religious and ethical issues.
- Lord Best, Chair of the House of Lords Communications Committee, told us his Committee chose not to consider matters of governance and regulation in their Inquiry; his impression is that they wouldn’t disagree with Sir David Clementi’s conclusions although there might be different views about the appointment of non-executive directors to a unitary board
- Lord (Don) Foster of Bath says [edited]:
 - “nothing must undermine the BBC’s independence and impartiality” agreeing in HoL with Lord Puttnam. “Lord Fowler talked powerfully about the need to develop mechanisms to reduce government interference in the BBC. Lord Lester will talk about how he believes statutory underpinning can help. The [HoL] committee report makes clear that maintaining independence and impartiality will be aided by a new charter which lasts for at least 10 years. This will also provide security in terms of planning and investment for the BBC and stability for the wider creative industries that relate to the BBC. That security and stability would be undermined if the charter period is set for a good period of time, but includes a mid-term review whose scope allows for the unpicking of bits of the charter itself. The next charter should be for 11 years, not 10 years, to decouple the charter review process from the general election cycle and allow full consultation and dialogue.
 - I opposed the establishment of the BBC Trust because it sought to be both a flag-waver for the BBC and a regulator of the BBC. These two roles are incompatible. Sir David’s proposal for an external regulator and a unitary board resolves this conflict, and I welcome it. However the independence of the BBC will not be achieved if the non-executive

members of the proposed board are government appointees. The Secretary of State at DCMS said recently that he did not think that the Government's appointment of BBC non-executives to the board would undermine independence, and pointed out that all 12 of the current members of the BBC Trust were appointed by the Government. I think that he is wrong. The current trust is far less powerful than the proposed unitary board, which will set the BBC's editorial direction, make key decisions on programmes and even have a say in how the BBC manages news.

- Giving these important powers to government appointees will understandably lead to accusations that we are creating a state broadcaster, not a public service broadcaster. A bizarre situation could arise in which decisions around how the BBC is reporting government policy or the action of Ministers is being decided by people appointed by the same Government or by the same Minister. That simply cannot be acceptable. Channel 4 has a similar board to the one proposed for the BBC, and its non-executives are all appointed by Ofcom, not by the Government. I believe that the BBC non-executives should also be appointed by an independent body, whether that be Ofcom or some other independent group.”
- Our members strongly believe that the BBC's governing structure should have representation from licence fee payers, stakeholders in the cultural sector and staff and other workers who help to produce and distribute content; the national and regional interests of UK citizens must also be represented. The BBC's independence is highly valued by viewers and listeners and should be robustly safeguarded by future governance arrangements.

Collation of key comments from: Emails received from key organisations & people:

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

At present all 'representatives' of the Licence Fee payers are appointed in their personal capacities; there is no direct accountable democratic link or responsibility. Proposed revised governance arrangements do not address this.

The BBC should be turned into a mutual organisation and its board elected by licence fee payers, a pair of MPs has suggested. (Steve Baker MP - Article printed in The Guardian on 29 March 2016)

Maintaining public trust, not Parliamentary favour, should be the BBC's constant concern. (Lord Patten - at St. Anne's College, Oxford (Reuter's Institute Lecture on 3 May 2016)

It is VLV's view that regulation and governance need to be clearly separated in the new model.

The system proposed in the White Paper is very suspect, with too much Government interference.

On governance, almost every single witness from whom we heard was highly critical of the BBC Trust model. Not only is there an in-built conflict between the two roles of acting as a regulator and arbitrator of complaints, as well as providing the highest level of oversight and management of the BBC, but there is confusion about the trust's responsibilities. (Select Committee Report - Future of the BBC on 25 February 2016 referred to by Baroness Healy)

The BBC Trust should be completely reorganised and should not under any circumstance contain the number of Government appointees rumoured in the papers over the last few weeks. (Lord Bragg)

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

I think it is quite unrealistic to expect a high level board, of people with busy day jobs, to be responsible for the management and editorial content of the BBC. On no account should the trustees from the nations be appointed by our or their government: they should be independent, not beholden.

The BBC Trust is accountable to no one, really. This creates a vacuum into which political interference from the government (of any colour) can leak.” (Steve Baker MP - Article printed in The Guardian on 29 March 2016)

A team of non-executives, all put in place by the government of the day, would be simply unacceptable. I am confident that Parliament would take this view too. (Lord Patten - at St. Anne’s College, Oxford (Reuter’s Institute Lecture on 3 May 2016)

VLV largely agreed with the conclusion of the CMS Select Committee published in its *Future of the BBC* Report in February 2015, namely that the BBC should have an external public interest body.

The Committee is clear that the Trust should be abolished and replaced by a unitary board with a non-executive chairman and a majority of non-executive directors. Responsibility for all aspects of the BBC’s operation would lie with that board, as is the case for many big organisations. (Select Committee Report - Future of the BBC on 25 February 2016 referred to by Baroness Healy)

I would like to express qualified satisfaction with this. Ofcom might well be the answer but I would like a final appraisal. (Melvyn Bragg)

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

The role of the BBC’s licence payers as its bulwark to protect its objectivity, and freedom from party political pressure, should be strongly promoted, explained and implemented.

More radical change is needed: the BBC should be mutualised. This would mean TV licence holders becoming members and owners of the BBC, thus solving the ownership deficit. (Steve Baker MP - Article printed in The Guardian on 29 March 2016).

I would establish a new, small Commission to guarantee the independence not just of the BBC but of all broadcasting. It would have three main roles. First, it would appoint the Chairman and non-executive directors of the BBC. Second, it would recommend and publish proposals for future levels of BBC funding. Third, it would appoint the Chair and deputy chair of Ofcom, which it seems will end up regulating all UK broadcasting. (Lord Patten - at St. Anne's College, Oxford (Reuter's Institute Lecture on 3 May 2016) [who would appoint the 'small Commission' and how?]

VLV wants the BBC to remain independent of Government control.

Whatever accountability framework is put in place for the BBC, it can only be effective if the regulatory body of the BBC is independent and strong. (referred to by Baroness Healy - BBC Charter Review by House of Lords entitled Reith not revolution published on 24 February 2016)

The National Audit Office should be given unfettered access. The Comptroller and Auditor General complained about the difficulties that he still faces and we see no reason why the NAO should not have statutory access. We also believe that Ofcom should have responsibility for all content regulation. (Select Committee Report - Future of the BBC on 25 February 2016 referred to by Baroness Healy)

Q4: Any other relevant comments respondents care to make will be appreciated

The culture of acknowledging, understanding and responding to those who pay for the service is achievable and desirable. It should be the dominating culture; and one which politicians could not ignore or repudiate.

Mutualising the BBC would lend new legitimacy to the licence fee and bring the BBC and the audience together — an audience without which the BBC cannot flourish. (Steve Baker MP - Article printed in The Guardian on 29 March 2016).

This all brings me back to where I began. Now is the time to speak up for the BBC and its independence before it's too late. (Steve Baker MP - Article printed in The Guardian on 29 March 2016).

I would certainly put a specific responsibility on the new Commission which I suggested be consulted and take account of the views of licence fee payers. Perhaps through the network of national and regional committees that already exists. (Lord Patten)

I am sure the BBC can have a great future, and there is absolutely no case for the Government to consider reducing its scale or scope. (Baroness Healy in House of Lords on 21 April 2016)

Collation of key comments from: Submission from key organisations & people oral: academic views

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- Yes: Trust has taken accountability seriously; puts on programmes public want and researches well
- But LF funding has been completely unaccountable; two major decisions which didn't involve public, listening to experts or even Parliament

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Yes; agree with unitary board and separate regulator

- But firmly against Government appointment of non-execs and even more of them being in a majority
- Ofcom primarily an economic regulator so some concern at it being only regulator of BBC; non-economic aspects of BBC are more important than economic ones
- Concern about Ofcom having ability to regulate BBC with present leadership; would have to adapt to soft issues, cultural issues; broadcasting much smaller industry than telecoms; Ofcom dominated by economic factors & concerns and if applied to BBC would be damaging
- There is a case for Ofbeeb light alongside Ofcom; if just Ofcom its consumer panel & content board need beefing up considerably and whole of Ofcom would need increased resources to cater for all of BBC's regulation and delivering suitable accountability
- Not a fan of consultations but is of research; too much democracy tends to attract single issue people, unrepresentative hostile groups so is counter-productive
- Need strong behavioural research capability to balance economic approach; Ofcom is not neutral; has explicit bias towards light touch & market solutions
- Citizenship & cultural issues are crucial and need equally strong voices to the economic ones
- Routes of Ofcom are in utilities & telecoms regulation & appears at present to be shedding broadcasting expertise
- Clementi right that BBC must be first port of call for complaints but Ofcom will still need increased operational capacity for that too
- Good balanced properly conducted research provides truly representative views whereas consultations are often unrepresentative;
- Government is easily biggest threat to the enormously successful UK broadcasting sector & the BBC

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- Great fan of accountability but not direct accountability in a country of 60m people; hard & soft accountability
- Vast array of opponents in media so absurd to think BBC can get away with things unreported and unchallenged
- BBC executives make more appearances before Parliamentary Committees than any other organisation so enormously accountable
- Supports consultations insofar as they attract views but does not think have an accountability gap but do have a democratic deficit
- BBC is very transparent; but do communities in Leicester feel engaged? Not a big issue; Channel 4 is exemplary on diversity & BBC is trying to raise its game on that; accountability not route to diversity
- Mistake to increase involvement of more vulnerable communities as opens up institution to opponents
- Appoint non-execs in public appointments way but without political interference or involvement; provide right skills mix
- Role descriptions of such non-execs can include responsibility for accountability as well as transparency
- Evidence comes from research to be representative of whole; need big research
- But agrees research can be biased eg O&O
- Hence don't want unitary or Ofcom boards made up of Government appointees
- Beware of creating hostage to fortune & opening BBC up to infiltration by its opponents one way or another

Collation of key comments from: Submissions from key organisations & people oral: broadcasters with executive experience

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- No – never has been satisfactory arrangement; major step forward with Trust – editorial committee has worked well & service licences worked well
- Black hole re proper consultation with LF payers – cultural problem; some BBC pockets good but lot poor – as Feedback presenter frustrated by statements rather than engagement & not answerable to audience
- Real test is how to make BBC accountable whilst workers remain independent & creatively free to try new things which may fail or succeed
- Unitary board danger; may throttle programmes & ideas at birth; especially when BBC in danger/under threat; better run financially & organisationally; vigorous journalism may reduce
- So how can fierce independence be protected
- Two boards messy but does foster open debate
- Whittingdale accused of appointing to arts boards & Johnson – but would be a public argument

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- unitary board & Ofcom regulator; all systems imperfect; Trust not as broken as some say/think; but dangers re public purposes especially re journalism;
- unclear how checks & balances can be in place between BBC & Ofcom; different level of complaints; BBC complaints may swamp Ofcom; relationship needs spelling out more;
- question re previewing programmes; safeguard re censorship; only judge afterwards; board is manager; chair if political appointment could block broadcast.
- Clementi doesn't say directors must have broadcasting/journalistic experience; Richard Tait had understanding; DG must retain editorial lead & not chair or any NEDS; need journalistic editorial board; DG becomes MD/CEO not DG any more
- Clementi has offered a business model from financial business background; but doesn't include broadcasting creative arts & journalistic business

- What powers to be devolved to DG etc; mustn't let board as whole influence broadcasting – big danger of political interference; no preview & sensor; general views re subjects only
- Need to have representatives of nations;
- What is reason for Whittingdale suggesting need more/majority of NEDS? what qualifications? One at least must have chosen journalistic record
- Approval by Select Committees? Proper interview; eg with Chair of Trust; no great safeguard

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- at present all on BBC & Trust's terms & can play off contradictions to advantage;
- responsibility to be answerable to LF payers lies with management; management should appear on programmes & take responsibility to be accountable more seriously;
- any substantial changes in BBC services should be required to lay out options to be debated and not just announce decisions; but mustn't smother innovation; unfair if LF payers have to pay but have no say in decisions about what services they get; minorities must have real say on specifics and not just generalities;
- format of debate and decision needs developing; if propose major change to a service must consult the audience of that service with real options and debate about ways.

Collation of key comments from: Submissions from key organisations & people oral: broadcasting executives

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- BBC Trust was always likely to be a confusing solution to the governance question. It seemed to end the "own referee" complaint about the Governors, but too often the Trust and Executive appeared together at Parliamentary hearings, presenting a united front.
- When things fell apart over executive pay-offs, it was clear the two boards regarded each other with suspicion, couldn't decide who was actually responsible for the policy, and blamed each other for what went wrong. The poor relationship between the Trust chairman and the DG (Lyons and Thompson) exacerbated the problem. It was clear that the Trust lacked the ability (or will) to control the executive.
- It was also quite wrong - and contrary to public company best practice - for the DG to chair the Executive board.

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Considerable consensus has emerged about how to replace the Trust. Rule-based regulation needs to transfer fully to Ofcom, including oversight of complaints regarding BBC impartiality
- A combined board of execs and non-execos also seems to have been accepted. This was something I advocated in "Beyond The Charter - the BBC after 2006", which was published by the Broadcasting Policy Group in 2004. It is the model used for Channel 4. It seems entirely uncontroversial. The chairman and deputy chairman both need to be non-executive, and non-executives should form at least half the board number.
- The Clementi report dealt with intricate detail, and has so far only made recommendations. He noted the likelihood that the new board would be likely to contain representatives of the nations (as has been the case with the Governors and Trust since time immemorial), and recommended that these also be government appointed, along with the chair and deputy (in the case of Channel 4, all the non-executives are appointed by Ofcom, with the chair and

deputy needing approval by the Secretary of State). Whittingdale has indicated that he would expect all BBC non-execs to be appointed by government (as are all Trust members currently, under the normal rules for public appointments).

- It isn't clear how to have two types of non-executive, some appointed by ministers, some by some other - unspecified - mechanism. Would they have equal rights? Could one group over-ride the other? This seems a recipe for confusion and weak governance.
- Questions have been raised as to whether all non-executives being appointed by government might compromise BBC independence, but I find this largely spurious. The ostensible problem is that government appointees might end up setting the BBC's editorial policies: but that seems deeply unlikely.
- The combined board will not be taking editorial decisions. Those are made by the output executives (typically, the Director of News and Current Affairs and senior colleagues, occasionally involving the heads of radio and television). Sometimes, even the DG does not know about highly significant editorial decisions (eg, the Newsnight items on Savile and McAlpine).
- Complaints about editorial decisions might well end up at the combined board. But that has always been the case, with the Governors and the Trust. This structure will be no different, and might actually be superior in providing transparency and good governance. I do not think there has been any "prior restraint" from the governing body since "Real Lives: At The Edge of the Union" in 1985. But the Trust was not backward in criticising broad editorial policy (the Middle East, the EU), or particular programmes ("Panorama" on Primark) - yet no-one claimed that this had anything to do with government appointees. I find this whole argument to be somewhat manufactured, especially when the provenance of Ofcom board appointees is thrown into the mix - as if Ofcom would be politically biased (because of government involvement in appointments) in judging complaints about the BBC where it was not in judging complaints about Channel 4 or any other UK broadcaster.
- The notion that the governance of the BBC might be more accountable if licence fee payers were represented on the board is unsound. The prospect of political groupings organising to secure board seats for their candidates in

any possible elections is unattractive, and would be much more likely to politicise the BBC than the Clementi proposals. The only meaningful way that the BBC could become properly accountable to licence fee payers would be if payment were voluntary. Michael Leapman (in his 1986 book "The Last Days of the BBC", p15) put one rarely-discussed aspect of this issue succinctly: "the BBC's case (for the licence fee) ignored the implications, in terms of compromising its independence, of having the licence fee set by the government - implications highlighted by the "Real Lives" affair. That is why Peacock recommended moving towards a subscription system."

- His point was underlined by the threat Northern Ireland Secretary Roy Mason made to the Governors back in the 1970s: if the BBC continued to report Northern Ireland in an independent fashion it could forget about ever again getting an increase in the licence fee. As licence fee settlements are rarely for more than a few years, the indirect pressure governments can use to influence the BBC editorially is rather more insidious than anything the governance structure can deliver.

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- A subscription system is not only the fairest and best way to fund the BBC, but also the one that pushes ministers right out of the picture. It is then the people who choose to pay for the BBC who should have the final say on the price of subscription (by exercising the right not to pay) and on the type of output (using the same mechanism). As content regulation would still stay with Ofcom, there would be no room for government involvement editorially.
- The one aspect of the Trust system that has been under-valued (and which may be lost in the proposed reforms) is quality control. The Trust set up service licences that were regularly reviewed, and had the expertise to judge what was working (and what not), as well as what was missing from BBC output. Ofcom lacks that expertise, and would have to beef up its Content Board significantly if it were to take over the task. Otherwise, it will be for the

BBC non-executives to exercise that function, which will require the appointment of experienced broadcasters to at least some of the posts.

Any other relevant comments respondents care to make will be appreciated

Regarding the licence fee settlements first:

- 2010 was an ambush. Unfortunately for the BBC, the Trust had already volunteered a licence fee freeze; and Mark Thompson had announced that the BBC was planning savings of £600m a year to re-invest in "putting quality first". Unsurprisingly, the coalition decided to seize the money for other purposes (World Service, broadband roll-out, S4C, local TV, Caversham) and extend the freeze indefinitely. Was it "political"? Or just financial (even Lyons acknowledged that when cuts were being made across the board, the BBC could not expect to be immune)? Notably, the DCMS was the only department without a LibDem minister...and, of course, the BBC itself had initiated "top-slicing" with the "digital switchover" fund agreed with Labour...
- If 2010 did not teach the BBC that it would be better off without the licence fee, there should have been no surprise when Osborne in 2015 tried to pull off the trick of disposing of the obligation to fund free TV licences for the over-75s, whilst maintaining the election pledge to continue providing free licences till 2020. As part of the negotiation, he conceded index-linking of the licence fee, and relaxation of the costs of broadband roll-out and S4C.
- The deal slightly favoured the BBC (roughly £700m contribution to the over-75s by 2020, but some £800m in value from the concessions in the same time frame). Importantly, the BBC is NOT OBLIGED to continue with the over-75s licences after 2020, but the index-linking will be on-going. So actually, not such a bad deal (as the BBC said, cash flat, but with the BBC having to absorb inflation).
- The notion that someone other than the government will set the licence fee is fantasy. That is a key area of public expenditure, and is the main lever by which politicians can influence the BBC (if they want to). Also, the BBC's liabilities (nearly £1bn in pension fund deficit and £1.9bn in property leases)

fall on the Treasury in the final analysis. It is BBC financial vulnerability that creates threats to BBC independence.

Now, subscription:

- Essentially, the only reason there might be a delay and a cost of any significance in converting the BBC to subscription is the deliberate decision taken by Greg Dyke when he was DG to prevent the inclusion of conditional access modules (CAMs) in Freeview boxes when ITV Digital collapsed and Freeview took over. Why an act of industrial sabotage should be allowed to inhibit the obvious solution to BBC funding is hard to fathom.
- The simple fact is that 15m homes (60% of the total) already pay for TV supplied by Sky, Virgin Media and BT. All those homes could instantly switch to a BBC sub if need be. On top of that Netflix and Amazon have well over 6m subscribers in the UK, using OTT (over-the-top) delivery systems. As superfast broadband roll-out to 95% of homes is due to be complete by 2018, it is clear that Whittingdale is fundamentally wrong.
- What he is essentially talking about is converting dumb Freeview boxes to CA-enabled ones. Each upgrade costs about £20. Given sufficient notice, all homes that want to keep BBC services on their steam televisions would be able to do so in a large-scale swap-out of new boxes for old. It might take 2 years, but it would be very much consumer driven. The faster it is done, the easier it will be for both the BBC and government to duck out of the over-75s subsidy (with just a back-stop for the minority of such homes which wanted the service but could not afford to pay for it).
- The BBC's hostility to subscription is based on the fear that more than 20% of households would choose to opt out. If that is the case, it is simply immoral to force those people to pay for the BBC, when they would rather do without it, by threatening them with prosecution.
- So the correct course of action is to decriminalise TV licence evasion first: that will reveal the scale of likely opting-out, although some people who avoid payment but still watch BBC output would end up paying if that was the only way to get round encryption, when that is introduced.

- The second step should be encrypting the i-Player. This is very easy. Indeed, the notion of making users of the i-Player liable to pay the licence fee is thoroughly quixotic, as enforcement without encryption would be impossible. That is why even the BBC is talking about passwords for i-Player access, based on your TV licence serial number. Finally, with sufficient notice, all BBC TV channels to be encrypted.
- Don't take the BBC's views on this issue at face value. This is a matter of political will. Why do the BBC and the government both deny that the licence fee provides politicians with leverage over the BBC? JW commissioned - and welcomed – David Elstein's 2004 report on the BBC, which firmly recommended subscription.

Collation of key comments from: Submissions from key organisations & people oral: regulators

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- No: argued for new structure; Trust never made up its mind whether it is a regulator or cheerleader
- Trust should have been the regulator
- An independent non-exec chair should have been appointed to the BBC Executive Board
- Regulators should not appoint those they regulate ie the DG
- Lack of clarity of role
- Regulator involved in LF negotiations; neither BBC nor BBC Trust consulted, engaged with nor were accountable for two 'secret' LF deals

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Unitary board & Ofcom as regulator will treat LF payers extremely properly as shareholders
- Concern that under Public Appointments system the panel puts up two names for any role and Governments of whatever make up makes decision which often seems to be politically driven
- Chair + Deputy Chair + 4 other non-execs all appointed effectively by Government is 'too heavy'; half the non-execs should be appointed by the BBC and only half by the Government process
- Public appointments process is tainted; appointments must be on merit and not political affiliation and cognisant of the necessary skills mix
- Appointments to Ofcom reasonably sound
- Ofcom content regulation being diluted; must be strong to take on BBC regulation; light touch, economically, market orientated & competition driven won't be appropriate for the regulation of the BBC as the leading public service broadcaster
- Broadcaster first for complaints but Ofcom will need beefing up to take on the BBC
- Main purpose of Executive Board should be to be accountable to the shareholders, the LF payers
- Audience Councils are captured by the usual suspects; but some democratic processes in the nations & regions to provide performance reviews plus AGMs; appointees should have genuine commitment to accountability and get out and about
- Increased genuine consultation required out around the country
- Cultural & attitudinal; slight 'fortress BBC' mentality by both BBC and Trust
- Attitudes & values have to be right; relationship with LFpayers needs to be paramount
- Be open & listen & don't raise the drawbridge
- Government & Ofcom should leave strategy to the BBC whilst fully supporting the public service principles because the business is public service broadcasting

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

As above

Any other relevant comments respondents care to make will be appreciated

- Licence to receive from whoever, historically; ie all public service broadcasting irrespective of broadcaster
- We've had top slicing for a long time now

Collation of key comments from: Submissions from key organisations & oral: other academics

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- No: need to ensure independence of BBC plus oversight to protect public interest
- Some research done by BBC Trust has been very valuable; rigour of data
- Conflating governance & regulation hasn't worked so at times BBC has not been adequately regulated and at others has not been properly supported
- Trust not given easy way of engaging with LF payers and not seemed to be priority; should have been more roadshows and town hall events; Trust needed to 'go on the road' to unfamiliar forums; by and large haven't connected with general audience; have tended to relate to professionals; needed to be more creative & leave London

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Not especially; unitary board makes sense; splitting roles of governance and regulation is sensible;
- Ofcom/Ofbeeb arguable – key is performance & ability to regulate effectively; regulation needs independence
- Accountability not sufficiently addressed in either board or regulator; generous to have 6 appointed by Government; Government suggestion of even more appointees by Government even worse
- Accountability demonstrated in actions; Public Appointments Unit process questionable after recent criticisms by outgoing chair
- Editorial & governance independence must not be interfered with at all politically
- Board must act in interests of LF payers unhindered
- Board must include necessary expertise, act effectively and be accountable; not beholden to BBC managers or Government; include LF payers & staff reps
- Royal Charter doesn't deliver accountability; prefers a statutory basis with Parliamentary accountability & increased public airing & transparency
- Nations reps should not be appointed by national governments either; board should look like LF payers so diverse as well as having professional expertise
- Agree need size of board that functions then supporting mechanisms such as audience councils can also be helpful as accountability level rather than another bureaucratic level
- But board itself must be much more diverse & accountable

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- Principles must lead structure of regulator as well; strong, independent regulator required; if Ofcom would need large increase in resources; mustn't compromise uniqueness of BBC

- Public purposes should expand and be adhered to; enormous improvements needed on diversity; oversight of executive on this needed
- Scope must remain as is and not become market failure broadcaster; must be allowed, encouraged obliged to take risks and also cater for large population groups;
- Be more proactive & innovative in forging partnerships
- No top slicing; short falls in genres elsewhere must be met by other measures
- Statutory might allow more political interference but no more than at present and would provide greater structural accountability; start from scratch; not at expense of independence or become political football as is at present
- Parliament would represent the people & hope not lead to increased political interference by building in safeguards
- More scrutiny than 'just' by Parliament

Collation of key comments from: Submissions from key organisations & people oral: Peers

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- Needs some improvements: Trust being responsible for both governance & regulation has caused problems; needs unravelling and start again
- Retrograde – Governors did provide a more effective board
- LF 'deals' examples of ineffectiveness of present arrangements
- Operational efficiency improvements have been made

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Unitary board will be advantageous; majority of non-execs appointed by Government completely unacceptable
- Regulation by Ofcom good move and will need increased resourcing to cope with BBC particularly in numbers and skills/expertise of personnel in every sense

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- Need greater transparency of appointment of LF payers representatives to board; has been discussing how this might be done with BBC but no particular ideas about mechanics but ways need to be found
- Non-execs to be appointed but not by Government; representative stakeholder interest to be delivered as is eg in NHS organisations
- Management consultants should be able to help devise a suitable framework to deliver accountability
- Diverse community eg in Leicester; audiences and communities may or may not feel represented by BBC; shouldn't be a tick box exercise; need degree of trust by LF payers in a broad approach
- Must have an effective unitary board that's not unwieldy
- Nations already have a Trustee; giving non-execs a duty of accountability would be entirely legitimate but not by quotas on a governing body; can cascade downwards; eg using Audience Councils to improve genuine consultation; focus groups can be helpful;

Any other relevant comments respondents care to make will be appreciated

- Must maintain BBC and protect independence of BBC which is the absolute fundamental vital issue needing focus

Collation of key comments from: Submissions from key organisations & people oral: Peers

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

No: BBC Trust couldn't make up mind whether regulator or cheerleader; when BBC most needed Trust chair to be cheerleader (had to?) stepped back and acted as regulator

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

Clementi model okay but:

- Government appointments would make 'state broadcaster' label more likely to stick
- Ofcom would need beefing up a lot; Ofcom has no idea how much work BBC will bring it, especially complaints; commercial approach will need tempering; content board will need widening & strengthening
- BBC is special/unique in being so self-critical – who else takes senior execs & non-execos to task on their own channels?
- Needs to balance that with more airtime for positives about itself
- Yes audience & users must be taken more seriously, involved, engaged with and be able to hold BBC to account
- However, a unitary board of the BBC must be fully functional
- Can't be too large
- Needs to have right skills mix
- Nations Non-Execos arrangement should continue
- Accountability responsibility can be built into role spec for (all) non-execos
- Beef up audience councils – can be representative/democratic – pyramid top down/bottom up
- All stations, channels & genres, nations & regions, communities to have their own audience councils and enjoy regular engagement & be able to hold BBC to account
- LF payers, audiences, users & public want to talk about the programmes & content; rarely about strategy & policy; but someone must
- It is difficult; but must be done

Collation of key comments from: Submissions from key organisations & people oral: experienced observers

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- Better than was; clear line of responsibility to LF payers an advance; but exposed BBC to significant risk; unclear who was in charge and responsible for what;
- Trust better than Governors in being accountable to LF payers; consulted more widely; listened more; Audience Councils unconvincing
- Better engagement
- Public has little option to joining BBC and fee is determined for LF payers so makes accountability all the more necessary; Parliament is natural democratic representative body so BBC has to be responsible to Parliament; it's a public organisation with an enforceable fee so has to have some Parliamentary scrutiny and engagement; public broadcaster must have a relationship with the state; it's a public service broadcaster; universal, publicly funded so state determines funding and remit
- Dichotomy for Trust of regulator and governor problematical; Governors didn't regulate; Trustees haven't cheered/supported;

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- State therefore will have some say in appointments; operational editorial unitary board then tricky if host of Government appointees thereon; sparingly, Nolan+ , no Government relationship with suitable checks & balances
- Practicalities are the challenge; more definition about diversity needed; single board will need clear criteria for distinctiveness; judgement of performance must be free of political interference

- Clementi didn't go very far re accountability; satisfied with proposed framework
- Single powerful board to protect BBC's independence welcome;
- Ofcom as BBC's regulator okay; Trust has been far too engaged with BBC production; regulator is there to ensure minimum standards are maintained; job of board is to aspire to highest standards
- Board need to take on lot of what Trust has done; Ofcom as regulator shouldn't be responsible for quality & distinctiveness; also Ofcom not good at that sort of stuff; and relationship of BBC with LF payers according to Clementi lies with the Board
- Board gets the money and remit so that's what has to be held accountable
- Ofcom has boring job of regulation for standards – must have no responsibility for delivery of BBC remit because it would then be the supreme body & decider of public interest and how it should be served
- So Board has all that responsibility and its make-up and appointment are crucial
- Lots of mechanisms can be used; Board must be small & tight & professional enough to run effectively a multi £bn business; but scope for greater election from a recruited panel and some direct role for public in appointments;
- Needs improved Audience Councils; consultative mechanisms required for BBC; engagement must be more sophisticated and wider; genres, stations, channels as we all as nations/regions;
- Strategic & policy board; BBC needs to be inventive; service by service, editorial areas, managerial functions may drive engagement in councils, consultations etc
- Consultative, advisory & accountable
- Public Appointments Unit delivers panel for election; guard against: self-selected voting pool; need meaningful vote; make sure selection of candidates is open but targeted; must be competent & have right skills set and mix; those voting must be representative & not hijacked by vested interests; not mandated appointees
- Greater involvement of public in selection to balance inevitable Government involvement

6. OUTCOME FROM WORKSHOP

A workshop was held at Cardiff University on 26 May 2016; the Agenda is at Appendix D. There it was agreed that the main points made in the submissions in response to the Inquiry's questions were:

Q1: Are you satisfied with the present governance of the BBC under the 2007 Charter as it relates to the accountability of the BBC and BBC Trust to licence fee payers? Please provide reasons.

- LF settlements unaccountable
- Conflating governance and regulation unhelpful
- Currently no link from boards to public
- No real engagement with public
- Need more roadshows/Town Halls
- Don't like appointments process
- Some Trust research valuable

Q2: Are you satisfied with the governance arrangements suggested for the future of the BBC under a new Charter from 2017 by Sir David Clementi as they relate to the accountability of the BBC and Ofcom to licence fee payers? Please provide reasons.

- Increased representation of LF payers at board level
- Non execs to be appointed on merit not political affiliation
- Opposed to direct government appointments
- Ofcom too rooted in economic regulation – too narrow for BBC regulation.
E.g. Not sufficient experience for service licences
- How to set criteria for “distinctiveness”?
- Operating licences good channel for public consultation
- (Research better than consultation – avoids interest group lobbying)
- Unitary board may throttle creativity
- Financial/business model, not creative
- Responsibility for delivery of remit should sit with board not Ofcom
- Need transparency of appointments process and LF deals
- Executive need to be more accountable

- Lose fortress mentality and culture
- New Commission to oversee appointments & guarantee independence
- LF payers to have role in selection of Non Execs
- LF payers represented at board level (4x Nations?) (But beware organised insurgency!)
- Separate boards for devolved nations responsible to devolved governments
- Appears to suggest 2 classes of NED?
- Reform Audience councils to be vehicles for genuine consultation
- Reflect greater diversity (gender/ethnic/LGBT)

Q3: Do you have any alternative suggestions as to how the BBC, its governors and regulators might be made accountable to licence fee payers? Please provide reasons and mechanisms.

- Hard v Soft accountability – direct accountability not realistic
- BBC already has most Select Committee appearances
- Non-exec's by public process, not government
- Expand public purposes and hold to account
- Management more open and public in answering complaints and questions.
- Audience consulted before any major changes
- Scrutiny beyond Parliament
- Mutual/Co-op proposal (Steve Baker)
- Online Complaints procedure
- Subscription would provide accountability

The workshop concluded:

Transparency

- Under the present Charter, the BBC and BBC Trust have undertaken increasing amounts of research and consultation which have provided a wealth of data about audience and service users' views, habits and natures; however, the public is largely unaware of the information available and much greater feedback and publication is required
- Data pool to be audited and published as to what there is

- BBC and Trust needed to tell their story more strongly and publish more of what they've done and learnt
- Whilst commercial confidentialities and sensitivities around data exist a greater account needs to be given
- Transparency must go much further and BBC must be more open
- Transparency drives trust; the 'fortress BBC' mentality must be broken down; openness is a role, a duty; accessibility is necessary at all levels and there must be leadership from the top by Lord Tony Hall and his executive team; criticisms of Lord Hall for being somewhat inaccessible noted
- Information regarding complaints must be more transparent; can be handled online

Accountability

- There is a big demand for greater public accountability
- Representation of stakeholders is a norm
- Accountability is beyond that 'just' to Parliament
- Must include national Parliaments but not just them either
- The duty to consult has been honoured; but there's a lot more to engaging and being accountable - so further to go
- Diversity must be better reflected in output and internally; is diversity of e.g. Leicester reflected by BBC? Not yet
- Devolution; nations and regions need much greater role in output and input within BBC
- Accountability to nations and regions must be strengthened
- Audience Councils; use and value? Outputs? Invisible and ineffective?

Engagement

- Have records of all LF payers so two-way communication available; if this presents any data protection issues they need to be addressed in conjunction with the Information Commissioner (to the extent this is allowed under data rules)
- We are in a new age of engagement, digital, online, social media
- The BBC should have an AGM

- There is a lack of understanding of the processes for complaints and governance
- There is too much jargon and ‘management-speak’;
- Different types of complaints: re content; re organisation
- There is a need for improved public media literacy; now greater than ever; seems to have lost impetus since Communications Act 2003 & last Charter
- Cooperation; ownership; involvement; collaboration; communication; education; information; feedback; all inter-linked
- Listening Project with Fi Glover a good model; travelling booths could be used regularly to collect views of the public, audiences and service users and information from them could be collated
- Role of public voice to support BBC and its independence; always strident opposition to specific threats eg Asian Network, 6Xtra, Top Gear, recipes, sports rights & coverage, BBC3; nebulous threats to BBC as a whole or unidentified parts more difficult but support for whole of outputs undeniable and reflected in audience and user numbers; the parts make up the whole; everyone’s own BBC adds up to the whole

Independence & governance

- The independence of the BBC is regarded as being sacrosanct
- The unitary board must be fully functional with the right skills mix
- Noted that politically it has been said no Prime Minister will willingly surrender the right to appoint the Chair and Deputy Chair of the BBC
- Are elections for BBC unitary board a realistic and practical possibility?
- People using BBC services willing to pay eg for radio, abroad; needs harnessing
- iPlayer loophole being closed
- Review of future funding of BBC and future of LF not announced; surprising
- Ofcom – regulator; pure and simple; will need to be assured of its PSB ethos, understanding and credentials

Left for *Save Our BBC* to draw together and reach conclusions and recommendations.

Subsequently on 29 June 2016 Lord Puttnam and Goldsmiths University of London published their “A Future for Public Service Television: Content and Platforms in a Digital World. A report on the future of public service television in the UK in the 21st century”. The report is available at: <http://futureoftv.org.uk/report/> . We particularly note pp 62-65 “The constitution, governance and regulation of the BBC” and pp161-162 Appendix 1: “Sir David Norrington’s proposals for appointing the BBC board”. For ease of reference see Appendix E.

7. CONCLUSIONS AND RECOMMENDATIONS

Our Conclusions:

- There is a demand, need and appetite from the public for real accountability, engagement, involvement, partnership, representation, dialogue, and transparency to consolidate trust.

Transparency

- The BBC, led by its executives, must be accessible and open
- Lack of information, data, feedback and media literacy must be addressed

Accountability

- Accountability is beyond that to Parliaments
- Accountability needs to be to the UK as a whole and to its nations and regions
- Consultation is not enough; engagement and accountability are much more and are necessary
- Clementi and others make no accommodation for accountability to the Licence Fee (LF) payers. Previously this was a responsibility of the Governors, the Trust and others although many believed this conflicted with other responsibilities

Engagement

- Licence Fee payers are stakeholders and must experience a stronger sense of ownership
- Engagement and accountability can be delivered using today's ICT
- Diversity & devolution must improve in outputs and inputs

Independence

- Independence of BBC is sacrosanct
- Future of funding of the BBC and its status by Royal Charter or other means need review
- Additional sources of income must be fully explored, including from radio users and those wanting to access BBC content and services from abroad

- Clementi recommendations for a unitary board and regulation by Ofcom generally accepted
- But most serious concerns about appointments process for non-executives to unitary board and fear of Government/political interference
- However, the unitary board must be effective and efficient

Audience Councils

- At present the BBC Audience Councils are advisory bodies of the BBC Trust. There are four Audience Councils – for England (12 members), Northern Ireland (11 members), Scotland (11 members) and Wales (11 members).
- Audience Council (AC) members are appointed by the BBC Trust for three year terms, as independent volunteers from outside the BBC. Each AC is chaired by the Trust member for the relevant nation.
- AC members are expected to have local networks and meet with the wider audience.
- AC weaknesses:
 - Only four and only nationally based; lacking diversity and not representatives
 - Appointed by a part of BBC structure which itself has a conflict of interest between governing the BBC and representing the licence fee payers
 - No authority
 - BBC is not accountable to them; advisory only
 - Divorced from vast numbers of audiences, service users and licence fee payers
 - Limited to those able to attend at least 6-8 meetings per year at a central location and be unpaid
 - Divorced from the main interests of audiences, service users and licence fee payers which are the programmes, content and digital services
 - Not using modern means of engagement and involvement, that is social media, modern devices and virtual gatherings

- Not accessible to vast swathes of the diverse population including ethnic minorities and workers.
- Full information about the existing BBC Audience Councils can be found at: http://www.bbc.co.uk/bbctrust/who_we_are/audience_councils

Our Recommendations:

- **It is time to establish proper engagement between the BBC and its LF payers and for the BBC to be clearly accountable to the LF payers.**
- **The Clementi model rightly distinguishes between governance and regulation.**
- **However, no accommodation has been made for accountability to the LF payers, previously a responsibility of the Governors, the Trust and others but resulting in conflicts of interest with their other roles.**

Public accountability and engagement:

- **A new, transparent, mechanism to consult and report back to Licence Fee payers – probably using online technology – should be introduced with a clear remit for increasing public accountability.**
- **Our recommendation for this is:**
 - **That all LF payers are automatic members of a LF Payers Forum and engagement is by digital and virtual means**
 - **Consideration must be given as to how LF payers without access to ICT can engage**
 - **Virtual Audience Councils should be established and facilitated by the BBC for:**
 - **All channels and services**
 - **Nations**
 - **Regions**
 - **Local radio stations**
 - **LF payers should be free to establish their own Audience Forums for any other means and to service them themselves**

- **All Audience Councils and Audience Forums should feed views to the LF Payers Forum**
- **The LF Payers Forum will act as the two-way communication conduit between the LF Payers and the BBC at board level**
- **We believe that this should not be a very costly or resource intensive framework**
- **The funding and resourcing for this should come from the LF income and will be the elements of funding which previously have paid for the accountability to the LF payers which has been the responsibility of various parts of the BBC, its governance and regulation.**
- **Note: The LF Payers Forum is necessarily a completely new organisation as its remit will be specifically and solely to act with and for the LF payers in relation only to the BBC and no other broadcasters.**
 - **We appreciate fully that this needs more detailed work and we call upon the BBC, the BBC Trust, Ofcom, the DCMS and Government and others to work with us in the coming few months to devise the necessary mechanisms so that at long last the stakeholders of the BBC, the LF payers, its audiences and service users, do have a real and effective relationship of engagement with the BBC and accountability from it.**

Regulation and Independence:

- **The regulator, now agreed to be Ofcom, should not have any accountability to the LF payers but must be required to take their interests and views into account.**
- **The unitary board must be effective as the vehicle for the management and strategy of the BBC; we agree it must not be unwieldy and we do not see a realistic and practicable means of individual directors, executive or non-executive, being directly mandated/elected/appointed by LF payers. We agree with most of the recommendations made by Sir David Normington in his paper “Appointing the BBC board”.**

- Our only disagreement with him is that we believe only the Chair and Deputy Chair should be subject to his point 4.iv; that it, the secretary of state should be presented with the two best candidates for the positions of chair and deputy chair and must appoint one of them or ask for a rerun. We recommend that an independent selection panel appoints the other four non-executive directors itself without any political involvement.
- It is essential that the unitary board has the right mix of people, backgrounds and skills to deliver a BBC which continues to be the best public service broadcaster in the world and a national treasure, whilst delivering efficiencies and value for money.
- The job specification for all unitary board directors, executive and non-executive, must include the responsibility to be accountable to the LF payers.
- Four non-executive directors must additionally be given specific additional responsibility to be accountable to the elected representatives and LF payers of the four nations; however, they should not have to be selected from people of that nationality as it is more important that the skill mix of the unitary board is made up of the very best people for the roles; where there is an equality of candidates this may be a deciding factor.
- The BBC should hold an AGM made accessible to the public by virtual means
- The BBC should hold an AGM specifically related to each of the four nations
- All Audience Councils should hold an AGM

-oo0oo-